

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiff,

Case No. 1:24-cv-00040-EAW-MJR

vs.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**NOTICE OF THIRD-PARTY MOTION TO INTERVENE FOR PURPOSES OF FILING
AN OBJECTION TO RECEIVER'S REPORT AND A MOTION TO APPOINT
SPECIAL RECEIVER AND FOR OTHER PURPOSES**

**ORAL ARGUMENT REQUESTED
NOTICE OF INTENT TO FILE REPLY**

Moving Parties:

Ice Legal, P.A., Thomas Ice and Ariane Ice
("Ice Legal")

Date and Time

To be determined by the Court.

Place:

Robert H. Jackson United States Courthouse
2 Niagara Square, Buffalo, New York 14202

Supporting Papers:

Memorandum in Support of Third-Party
Motion to Intervene for Purposes of Filing an
Objection to Receiver's Report and a Motion
to Appoint Special Receiver and for Other
Purposes

Answering Papers:

To be filed on a schedule determined by the
Court. The moving parties intend to file a
reply.

Relief Requested:

An order granting Ice Legal the right to intervene in this matter under Rule 24(a)(2), or alternatively by permission under Rule 24 (b)(2)

Grounds For Relief:

Rules 24(a)(2) and (b)(2) Fed. R. Civ. P.

Oral Argument:

The Proposed Intervenors request oral argument.

Dated: May 7, 2025

Lundergan Legal, LLC

/s/ Amanda L. Lundergan

Amanda L. Lundergan, Esq.
Post Office Box 211474
Royal Palm Beach, FL 33421
Direct: (561) 779-4126
Assistant: (561) 629-2643
Email: amanda@lunderganlegal.com

*Attorneys for Proposed Intervenors,
Ice Legal, P.A., Thomas Ice and
Ariane Ice*